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Counsel for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JOSEPH H.
MARGOLIES IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED (DKT. 1033)**

Judge: Hon. Yvonne Gonzalez Rogers

I, Joseph H. Margolies, declare as follows:

1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I am making this declaration pursuant to Civil Local Rule 79-5(e)–(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 1033.

2. On October 17, 2023, Plaintiffs filed their Administrative Motion to Consider Whether Another Party’s Material Should be Sealed re: Parties’ Motions *in Limine* (Dkt. 1033) (“Motion”). On October 17, 2023, I obtained unredacted copies of the document sought to be sealed.

3. I have reviewed the documents that Plaintiffs moved to file under seal pursuant to Civil Local Rule 79-5(f). Based on my review, there is good cause to seal the following:

a. Plaintiffs’ Motions *in Limine* and Oppositions to Google’s Motions

Document	Portions to be Filed Under Seal	Basis for Sealing
Declaration of M. Logan Wright ISO Plaintiffs’ Motion in Limine 1 to Preclude Google from Relying on Non-Public Source Code at Trial Appendix A: GOOG-BRWN-00858535	Highlighted Portions at: Seal Entirely	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including details regarding Google’s internal projects and source code, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information

1			to compromise Google's internal practices relating to competing products.
2	Declaration of M.	Highlighted Portions at:	The information requested to be sealed
3	Logan Wright ISO	Page 3	contains Google's highly confidential
4	Plaintiffs' Motion in		and proprietary information regarding
5	Limine 1 to Preclude		highly sensitive features of Google's
6	Google from Relying on		internal systems and operations,
7	Non-Public Source		including details regarding Google's
8	Code at Trial		internal projects, identifiers, databases,
9			and their proprietary functionalities, that
10	Exhibit 3: 2021-04-30		Google maintains as confidential in the
11	Letter re: Google		ordinary course of its business and is not
12	Source Code		generally known to the public or
13			Google's competitors. Such confidential
14			and proprietary information reveals
15			Google's internal strategies, system
16			designs, and business practices for
17			operating and maintaining many of its
18			important services, and falls within the
19			protected scope of the Protective Order
20			entered in this action. <i>See</i> Dkt. 81 at 2–3.
21			Public disclosure of such confidential
22			and proprietary information could affect
23			Google's competitive standing as
24			competitors may alter their systems and
25			practices relating to competing products.
26			It may also place Google at an increased
27			risk of cybersecurity threats, as third
28			parties may seek to use the information
			to compromise Google's internal
			practices relating to competing products.
	Declaration of M.	Highlighted Portions at:	The information requested to be sealed
	Logan Wright ISO	Page 4	contains Google's highly confidential
	Plaintiffs' Motion in		and proprietary information regarding
	Limine 1 to Preclude		highly sensitive features of Google's
	google from Relying on		internal systems and operations,
	Non-Public Source		including details regarding Google's
	Code at Trial		internal projects and identifiers, that
			Google maintains as confidential in the
	Exhibit 4: 2021-05-25		ordinary course of its business and is not
	Letter re: Non-Public		generally known to the public or
	Source Code		Google's competitors. Such confidential
			and proprietary information reveals
			Google's internal strategies, system
			designs, and business practices for
			operating and maintaining many of its
			important services, and falls within the
			protected scope of the Protective Order

		entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
<p>Declaration of M. Logan Wright ISO Plaintiffs’ Motion in Limine 1 to Preclude google from Relying on Non-Public Source Code at Trial</p> <p>Exhibit 5: 2021-06-30 Letter re: source code</p>	<p>Highlighted Portions at:</p> <p>Page 2</p>	<p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including details regarding Google’s internal projects and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p>
<p>Declaration of M. Logan Wright ISO Plaintiffs’ Motion in Limine 1 to Preclude google from Relying on Non-Public Source Code at Trial</p>	<p>Highlighted Portions at:</p> <p>Page 1</p>	<p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including details regarding Google’s internal logs, that Google maintains as confidential in the ordinary course of its</p>

<p>Exhibit 6: 2023-02-22 Email re: Brown - Source Code Review - Request to Print</p>		<p>business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
<p>Declaration of Ryan J. McGee ISO Plaintiffs' Motion in Limine Number 5 to Preclude Google from Introducing Disparaging Evidence or Argument</p> <p>Exhibit B: GOOG-BRWN-00568364</p>	<p>Highlighted Portions at: Seal Entirely</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal projects, prototyping, and product assessments, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information</p>

		to compromise Google's internal practices relating to competing products.
<p>Declaration of Ryan J. McGee ISO Plaintiffs' Motion in Limine Number 5 to Preclude Google from Introducing Disparaging Evidence or Argument</p> <p>Exhibit D: GOOG-CABR-05266100</p>	<p>Highlighted Portions at:</p> <p>Pages 2–3, 25–32, 36–41</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal projects and assessments, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
<p>Plaintiffs' Opposition to Google's Motion in Limine Number 1 to Exclude Evidence and Argument re: Sanctions Proceedings and Discovery Misconduct</p>	<p>Highlighted Portions at:</p> <p>Pages 1:22; 1:23; 2:3; 2:5; 2:11; 2:16–17; 2:20; 2:24; 3:3; 3:9–10; 3:18; 3:23</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal logs, log fields, and metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3.</p>

		Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
<p>Declaration of Alexander Frawley in Opposition to Google's Motion in Limine Number 1: re: Sanctions</p> <p>Exhibit 2</p>	<p>Highlighted Portions at:</p> <p>PDF Pages 7, 9</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal logs, log fields, and metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
<p>Plaintiffs' Opposition to Google's Motion in Limine Number 4 to Exclude Evidence and Argument re: Joining Data</p>	<p>Highlighted Portions at:</p> <p>Pages 3:27–28; 4:8–9</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal logs and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to</p>

		<p>the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p>
<p>Declaration of Alexander Frawley in Opposition to Google’s Motion in Limine Number 4 re: Joining Data</p> <p>Exhibit 1</p>	<p>Highlighted Portions (in Blue) at:</p> <p>PDF Pages 3–4; 6–7</p>	<p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including details regarding Google’s internal projects and proposals, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p>

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Declaration of Alexander Frawley in Opposition to Google's Motion in Limine Number 4 re: Joining Data Exhibit 2	Highlighted Portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal projects and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
18 19 20 21 22 23 24 25 26 27 28	Plaintiffs' Opposition to Google's Motion in Limine Number 3 Regarding 104 Documents that Google Claims are Irrelevant	Highlighted Portions at: Pages 1:16–17; 1:22; 2:5–6; 2:14–19; 3:12–13; 3:16–17; 321–23; 4:2–3; 5:21–22	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal projects and proposals, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential

		and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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b. Google's Motions *in Limine* and Oppositions to Plaintiffs' Motions

Document	Portions to be Filed Under Seal	Basis for Sealing
Google LLC's Motion in Limine No. 1 to Exclude Evidence and Argument Regarding Sanctions Orders, Sanctions Proceedings and Purported Discover Misconduct	Highlighted Portions at: Page 4:26	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal logs and metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products
Google LLC's Motion in Limine No 2 to Exclude Evidence and Argument Regarding	Highlighted Portions at: Pages 1:21–22; 1:25; 1:27; 2:1–3; 2:25	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's

<p>Class-wide Damages and Certain Other Damages Evidence</p>		<p>internal systems and operations, including details regarding Google’s internal projects, as well as metrics related to Google’s financial information, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products</p>
<p>Google LLC’s Motion in Limine No. 3 to Exclude Evidence and Argument Regarding Products, Services, Regulations, and Data Flows Outside of the Scope of Plaintiffs’ Allegation</p>	<p>Highlighted Portions at: Page 3:1–22</p>	<p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including details regarding Google’s internal projects and proposed features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s</p>

		competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products
Declaration of Carl Spilly ISO Google LLC's Motion in Limine No. 3 to Exclude Evidence and Argument Regarding Products, Services, Regulations, and Data Flows Outside of the Scope of Plaintiffs' Allegation	Highlighted Portions at: PDF Pages 19–21	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal projects and proposals, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products
Google LLC's Motion in Limine No. 4 to Exclude Evidence and Argument Regarding the Joining of Authenticated and Unauthenticated Data	Highlighted Portions at: Pages 1:26–27; 2:11	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal logs and nomenclature, that Google maintains as confidential in the ordinary course of its business and is

		<p>not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products</p>
<p>Declaration of Tracy Gao ISO Google LLC's Motion in Limine No. 4 to Exclude Evidence and Argument Regarding the Joining of Authenticated and Unauthenticated Data</p>	<p>Highlighted Portions at: PDF Pages 5–8; 10–29; 31–50</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal projects, databases, and logs, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties</p>

		may seek to use the information to compromise Google's internal practices relating to competing products
Google LLC's Opposition to Plaintiffs' Motion in Limine 1 to Preclude Google from Relying on Non-public Source code at Trial	Highlighted Portions at: Pages 1–2	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's source code, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products
Declaration of Viola Trebicka ISO Defendant Google LLC's Opposition to Plaintiffs' Motion in Limine 5 re: Disparaging Evidence or Argument	Highlighted Portions at: Pages 25–40	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal projects, databases, and logs, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business

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		practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products. Google has also redacted Plaintiffs’ personal information on pages 8–9. Google may reduce its request to seal the material on pages 25–40 when the final version of the draft document reflected on those pages is filed.
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4. Google’s request is narrowly tailored in order to protect its confidential information. These redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored and limited to portions containing Google’s highly confidential or confidential information, Google requests that the portions of the aforementioned documents be redacted from any public version of those documents.

5. Google does not seek to redact or file under seal any portions of the Pretrial Statement not indicated in the table above.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in Bayside, Wisconsin on October 24, 2023.

By /s/ Joseph H. Margolies
Joseph H. Margolies